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Attorney for Defendant  
QUENTIN NELSON

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:24-CR-00314-DJC
	)	
Plaintiff,	)	<b>STIPULATION REGARDING</b>
	)	<b>EXCLUDABLE TIME PERIODS UNDER</b>
vs.	)	<b>THE SPEEDY TRIAL ACT; FINDINGS AND</b>
	)	<b>ORDER</b>
QUENTIN NELSON,	)	
	)	DATE: October 23, 2025
Defendant.	)	TIME: 9:00 AM
	)	JUDGE: Hon. Daniel J. Calabretta

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**STIPULATION**

The United States of America, by and through its counsel of record, Ross Pearson, and Quentin Nelson ("Defendant"), by and through his counsel of record, Assistant Public Defender, Noa Oren, hereby stipulate as follows:

1. By previous order, this matter was set for status on October 23, 2025.
2. By this stipulation, the parties now move to continue the status conference until December 4, 2025, at 9:00 a.m., and to exclude time between October 23, 2025, and December 4, 2025, under Local Code T4 and 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).
3. Mr. Nelson has been indicted on 2 counts related to child exploitation: Count One charges Mr. Nelson with Receipt and Attempted Receipt of Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A), (b)(1); and Count Two charges Defendant with Possession of Prepubescent Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2). Due to

1 the nature of the investigation and charges, discovery in this case has been voluminous and will  
2 require careful and thorough review by the parties. The parties obtained a joint Protective Order  
3 on April 17, 2025, to govern discovery dissemination. (ECF No. 12). The defense has reviewed  
4 discovery. Defense requires additional time to conduct follow-up investigation and mitigation.  
5 Mr. Nelson is housed at Taft so communication with him will require more labor and potential  
6 travel at this stage.

7 4. Accordingly, the parties agree and stipulate, and request that the Court find the  
8 following:

- 9 a) Pursuant to the aforementioned Protective Order, the United States has  
10 provided counsel for the defendant with a large amount of discovery in this  
11 case, which includes records of FBI and CDCR reports, access to full  
12 electronic data extractions from multiple devices, search warrant records  
13 returns, chat logs, bank records and peer-to-peer payment logs from multiple  
14 institutions relating to accounts in various names. The United States has  
15 also provided CDCR records, recorded media, and records from various  
16 electronic service providers.
- 17 b) Counsel for Defendant desires additional time to work with her investigator  
18 to conduct her own investigation and to discuss potential resolutions with  
19 her client.
- 20 c) Counsel for Defendant believes that failure to grant the above-requested  
21 continuance would deny her the reasonable time necessary for effective  
22 preparation, taking into account her exercise of due diligence.
- 23 d) The United States does not object to the brief continuance.
- 24 e) Based on the above-stated findings, the ends of justice served by continuing  
25 the case as requested outweigh the interest of the public and Defendant in a  
26 trial within the original date prescribed by the Speedy Trial Act.
- 27 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
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3161, et seq., within which trial must commence, the time period of October 23, 2025 to December 4, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A), B(iv) [Local Code T4] because it is a continuance granted at Defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and Defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 1, 2025

HEATHER E. WILLIAMS  
Federal Defender

/s/ Noa E. Oren  
NOA E. OREN  
Attorney for Defendant  
QUENTIN NELSON

Dated: October 1, 2025

ERIC GRANT  
United States Attorney

/s/ Ross Pearson  
ROSS PEARSON  
Assistant United States Attorney

**ORDER**

IT IS SO FOUND AND ORDERED this 3<sup>rd</sup> day of October, 2025.

/s/ Daniel J. Calabretta

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HON. DANIEL J. CALABRETTA

UNITED STATES DISTRICT COURT JUDGE